

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER)
of the NEW ENGLAND TEAMSTERS AND)
TRUCKING INDUSTRY PENSION FUND)
)
Plaintiff,)
) C.A. No. 04cv11125 NG
v.)
)
STAMPRETE OF RHODE ISLAND, STAMP)
CRETE OF RHODE ISLAND, INC.)
AND STAMPED CONCRETE, INC.)
)
Defendant,)
)

MOTION TO EXTEND THE DEADLINE FOR DISCOVERY

NOW COMES the Plaintiff in the above named matter and request an extension of the discovery deadline from June 29, 2005 to July 15, 2005. The extension is requested because the deposition of Michael Pezza was canceled due to Counsel Bruce Thompson's illness and because the discovery requested by Plaintiff was not made available prior to the deposition as was promised. The extension is necessary in order to allow Plaintiff to complete his discovery in light of this delay.

Respectfully submitted,

For the Plaintiff,
CHARLES LANGONE, FUND MANAGER,
By his Attorney,

/S/ Catherine M. Campbell
Catherine M. Campbell
BBO #549397
Feinberg, Campbell & Zack, P.C.
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Certificate of Service

I, Catherine M. Campbell, do hereby certify that on this date, I served the foregoing by first-class mail upon Bruce E. Thompson, Esq., Casey & Thompson, P.C., 8 North Main Street, Attleboro, MA 02703.

/S/ Catherine M. Campbell
Catherine M. Campbell

Date: June 29, 2005